UNIVERSAL PROPULSION COMPANY, INC.

16 October 1995

Ms. Paula Bisson, (H-2-2) U.S. Environmental Protection Agency Region IX 75 Hawthorne Street San Francisco, CA 94103

Ref: UPCo RCRA Part A Application, Revision

Dear Ms. Bisson:

77 950/8 14424 20 950/8 14424 The attached RCRA Part A Permit Application is revised in order to include the signature of the Arizona State Land Department as the owners of the land which Universal Propulsion Company, Inc. occupies. The application has also been revised to reflect current conditions and operations at the facility.

The attached information is to be incorporated into the book of appendices marked "Revision 3" for UPCo's RCRA Part B Permit Application, 26 Sep 1994, as Appendix A.

Questions may be directed to me at (602) 516-3340.

Sincerely,

Stephen J. Miller

Manager, Safety & Environmental

encl: UPCo RCRA Part A Permit Application, 10 Oct 1995



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Fife Symington, Governor Edward Z. Fox, Director

September 19, 1995 Ref: HWP-EX779

Mr. Steve Miller Universal Propulsion Company 25401 N. Central Avenue Phoenix, AZ 85027

Subject:

STATE LAND DEPARTMENT SIGNATURE ON RCRA

PART A PERMITS

Dear Mr. Miller:

The Arizona Department of Environmental Quality (ADEQ) is currently reviewing Resource Conservation and Recovery Act (RCRA) Part B Permit applications for United Propulsion Company (UPCO) in Phoenix, Arizona. As part of the application, the permittee must submit a Part A application signed by the land owner. For your facility, the land owner is the State Land Department (SLD), who has not signed the Part A application.

ADEQ requires the signature of the land owner as well as the operator of the facility. The requirements for signatories to permit applications is defined in 40 CFR 270.11. Upon discussions with Mr. William Dowdle of SLD and Ms. Stephanie Helsten of the Attorney General's office, the land owner is in a position to sign the Part A application. In order to facilitate their signing of your Part A, would you please send the SLD the appropriate application page. Once signed, will you please forward a copy of that page to ADEQ for inclusion to your application.

Ref: HWP-EX779

Page 4 of 2

We appreciate your assistance on this issue. If you have any questions regarding the issue of signing the applications for your Part A application, please contact Murray E. Sharkey, P.E. the permit engineer for your site. He can be reached at 207-4169.

Sincerely,

Anthony Leverock, Manager Hazardous Waste Permits Unit

Waste Programs Division

ACL:MES:sll mesdsk2:PARTA.918

cc: Bill Dowdle, Arizona State Land Department
Stephanie Helsten/Patricia Boland, Office of the Attorney General
Andy Soesilo, Manager, ADEQ Hazardous Waste Section
Ethel DeMarr, Director, ADEQ Waste Programs Division
Murray E. Sharkey, ADEQ Hazardous Waste Permits Unit

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QC. Nature of Business (provide a brief description)

Design, develop and manufacture military aircraft ejection seats and related components for man-rated escape systems including required solid propellants and explosive loaded devices. Manufacture of explosive loaded devices for NASA Space Shuttle Program. Manufacture of solid propellant loaded decoy devices, gas generators and flare simulators.

XII. Process - Codes and Design Capacities :

- A. PROCESS CODE Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the addition information, if a process will be used that is not included in the list of codes below, then describe the process (including its of capacity) in the space provided in item XIII. The second second
- B. PROCESS DESIGN CAPACITY For each code entered in column A, enter the capacity of the process.

 1. AMOUNT -Enter the amount. In a case where design capacity is not applicable fraction in a enforcement action) enter the total amount of waste for that process unit.

 2. UNIT OF MEASURE For each amount entered in column B(1), enter the code amount the base of units of measure that are listed below should be used.

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Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)



State Land Department

1616 WEST ADAMS -

PHOENIX, ARIZONA 85007



October 12, 1995

Stephen J. Miller
Manager, Safety and Environmental
UPCo
25401 N. Central Avenue
Phoenix, Arizona 85027-7899

RE: State Commercial Leases 03-1349 & 03-52328

Dear Mr. Miller:

Universal Propulsion Co., Inc. (UPCo) leases State Trust land from the State Land Department to conduct its business of designing, developing and manufacturing military aircraft ejection seats. A hazardous waste permit under the Resource Conservation and Recovery Act is required by the U.S. Environmental Protection Agency and the Arizona Department of Environmental Quality in order for UPCo to operate. Execution of Part A of that permit requires the signature of the landowner.

Enclosed, per your request, is Part A of the permit application with my signature, on behalf of the State Land Department, as landowner.

If you have any questions, please contact me at 542-2119.

Sincerely,

William Dowdle

Manager

Environmental Resources & Trespass Section

WD/ch

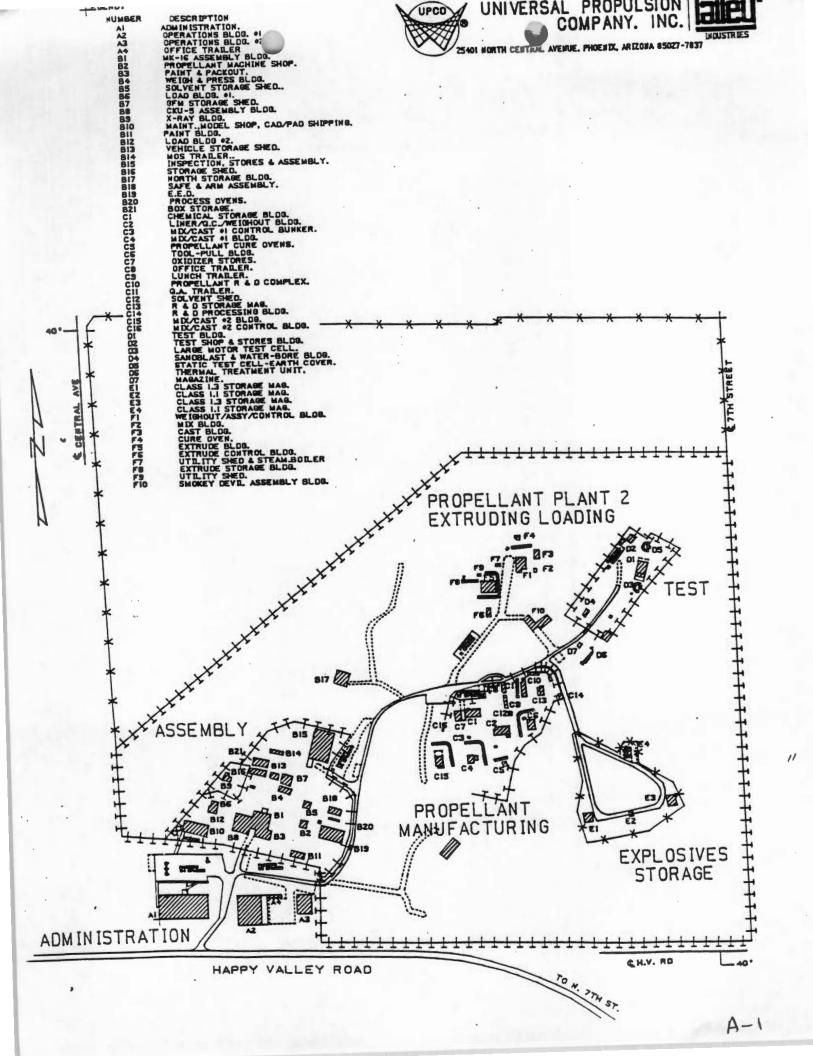
LIST OF ATTACHMENTS

TO EPA

HAZARDOUS WASTE PERMIT APPLICATION

PART A

ATTACHMENT	TITLE
A-1	UPCo Facility (File 2011.050, 8.5 X 11)
A-2	UPCo Facility (Drawing 2011.050D, D-size)
A-3	Utilities Map: Well and Septic System Locations (Drawing 2011.052B, D-size)
A-4	Plotted Well Locations on Topographical Map with Arizona Well Registry Report
A-5	UPCo Septic Systems, Wells and Other Sites (size and location)
A-6	Solid Waste Management Units (Drawing 2011.055E, D-size)
A-7	Photographs of UPCo waste areas (6)
A-8	Aerial Photograph of UPCo Facility (Included with Part A dated June 16, 1993)



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EPA LD. Number (ante m page 1) ondary ID Number (enter from page 1)

AL Nature of Business (provide a brief description) .

Design, develop and manufacture military aircraft ejection seats and related components for man-rated escape systems including required solid propellants and explosive loaded devices. Manufacture of explosive loaded devices for NASA Space Shuttle Program. Manufacture of solid propellant loaded decoy devices, gas generators and flare simulators.

XII. Process - Codes and Design Capacities :

- Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in them. Yill A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. capacity) in the space provided in item XIII.
- B. PROCESS DESIGN CAPACITY For each code entered in column A, enter the capacity of the process.
 - 1. AMOUNT -Enter the amount. In a case where design capacity is not applicable fruck as in a closure/post-closure or
- enforcement action) enter the total amount of waste for that process unit.

 2. UNIT OF MEASURE For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS Enter the total number of units used with the corresponding process code.

PROCE:	SS PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE	UNIT OF MEASURE CODE
	DISPOSAL:	P	GALLONS	G
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS PER HOUR	E
D80	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER DAY	U
D81	LAND APPLICATION	ACRES OR HECTARES		
082	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS	L
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER HOUR	Н
	STORAGE:	641.045.05.17535	LITERS PER DAY	v
501	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS	SHORT TONS PER HOU	R D
502	TANK .	GALLONS OR LITERS	METRIC TONS PER HOL	in w
503	WASTE PILE	CUBIC YARDS OR CUBIC METERS	METAIC TONS PER HOC	/n //
504	SURFACE IMPOUNDMENT	GALLONS OR LITERS	SHORT TONS PER DAY	N
	TEEL-MENT:		METRIC TONS PER DAY	s
701	TANK	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUR	
TCZ	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY		
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC	KILOGRAMS PER HOUR	?R
		TONS PER HOUR; GALLONS PER HOUR; TITERS PER HOUR; OR BTU'S PER HOUR;	CUBIC YARDS	Y
TC4	COURT TOCATORNIE	CALLOUS DED DAY LITERS DED DAY	CUBIC METERS	c
64	OTHER TREATMENT	POUNDS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER	ACRES	В
	(Use for pnysical, chemical, thermal or biological treatment	HOUR; KILOGRAMS PER HOUR; METRIC		
	processes not occurring in	TONS PER DAY; METRIC TONS PER	. ACRE-FEET	
	tanks, surface impoundment or incinerators. Describe the	HOUR; OR SHORT TONS PER DAY	HECTARES	0
	processes in the space provided in Item XII.)		HECTARE-METER	F
			BTU's PER HOUR	v
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C Description of Hazardoue Wastes

MATERIAL NAME OF STREET

CFR. Part 261 Subpart C that describes the Characteristics articles of CFR. Part 261 Subpart C that describes the Characteristics articles of CFR. of Subpart D of each listed hazardous waste on B, enter the four-digit number(s) from 40 miles of those hazardous

- A ESTIMATED ANNUAL QUANTITY, For each Based waste entered in handled on an annual basis. For each characteristic or toxic contami ant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or conta
- C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are: and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	κ
TONS	· 7	METRIC TONS	М

Con Sante If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific presty if the state.

D. PROCESSES the state of the s

1. PROCESS CODES:

The state of the s For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, trested, and/or disposed of at the facility.

and the second

For non-listed hazardous waste: For each characteristic or hotic contaminant entered in column A sele Act of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or total contaminant.

THE MAN PARTY OF THE PARTY OF THE NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.

- 2. Enter "000" in the extreme right box of item XV-D(I).
- 3. Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on હાલાની રોલ્પોચ છે તેમ the form (D.(2)). 7:1

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, 💯 and D by estimating the total annual quantity of the wasie and describing all the processes to be used to treat, store, and/or dispose of the waste. तर कर्मा होता है है है जिसके हैं है जिसके है के लिए के देश है है कि जाता है ह
 - 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
 - Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

متصحيح والمجاورة فسند والمحالة المارا والمجاورة والمتارك EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in anincinerator and disposal will be in a landfill. 1 - 3

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Job Title	Phone Number (area code and number	THE HOUSE
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XI. Nature of Business (provide a brief description)

Design, develop and manufacture military aircraft ejection seats and related components for man-rated escape systems including required solid propellants and explosive loaded devices. Manufacture of explosive loaded devices for NASA Space Shuttle Program.

XII. Process - Codes and Design Capacities

- A. PROCESS CODE Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in item XIII.
- B. PROCESS DESIGN CAPACITY For each code entered in column A enter the capacity of the process
 - AMOUNT —Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.
 - 2. UNIT OF MEASURE For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS Enter the total number of units used with the corresponding process code.

ROCES	SS PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE	UNIT OF MEASURI CODE
	Dianasii			
	DISPOSAL:	19	GALLONS	G
79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS PER HOUR	?E
080	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER DAY	U
081	LAND APPLICATION	ACRES OR HECTARES		
280	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS	L
083	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER HOUR :	Н
	STORAGE:		LITERS PER DAY	V
501	CONTAINER	GALLONS OR LITERS	CUCOT TOUG DED U	0110
	(barrel, drum, etc.)		SHORT TONS PER H	OUR D
502	TANK	GALLONS OR LITERS	METRIC TONS PER H	OUR W
503 504	WASTE PILE SURFACE IMPOUNDMENT	CUBIC YARDS OR CUBIC METERS GALLONS OR LITERS	SHORT TONS PER D	
	TREATMENT:		METRIC TONS PER D	DAY S
101	TANK	GALLONS PER DAY OR LITERS PER DAY	DOLLINGS DED HOUD	
102	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUR	
103	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR: GALLONS PER HOUR:	KILOGRAMS PER HO	OUR R
		LITERS PER HOUR; OR BTU'S PER HOUR	CUBIC YARDS	Y
T04	OTHER TREATMENT	GALLONS PER DAY: LITERS PER DAY:	CUBIC METERS	C
		POUNDS PER HOUR: SHORT TONS PER	ACRES	B
	(Use for physical, chemical, thermal or biological treatment	HOUR; KILOGRAMS PER HOUR; METRIC		
	processes not occurring in	TONS PER DAY; METRIC TONS PER	ACRE-FEET	A
	tanks, surface impoundment or incinerators. Describe the processes in the space	HOUR; OR SHORT TONS PER DAY	HECTARES	0
	provided in Item XIII.)		HECTARE-METER	F
			BTU's PER HOUR	V

- - W. W. ..

TO

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S. S. Seller or Charles ...

AND THE REAL PROPERTY.

- column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds peryear of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an Incinerator and disposal will be in a landfill. water a series of the series o

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4	2	D	0	0	1												included in above
	3	D	0	0	5					Star S							included in above
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

MEMORANDUM

Subject: Revised Part A

Universal Propulsion Co., AZD980814479

From:

Debbie Albert, PRC

To:

Enclosed is the revised Part A for the above referenced facility. Please enter data as submitted. Do not return the Part A for an original signature. The original was sent to Arizona DEQ, which has already approved this modification.

Thanks.

LIST OF ATTACHMENTS

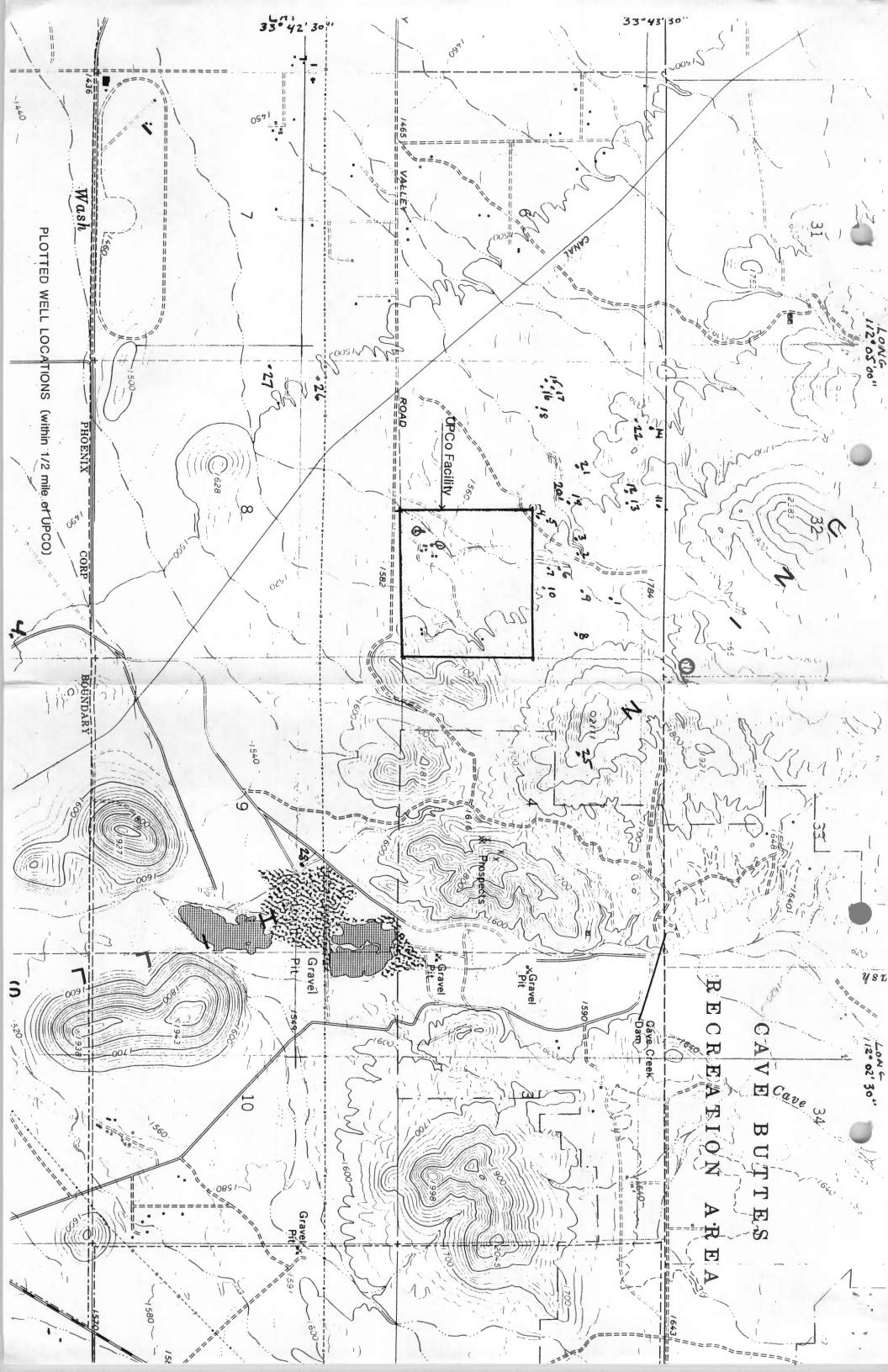
TO EPA

HAZARDOUS WASTE PERMIT APPLICATION

PART A

ATTACHMENT	TITLE
1	UPCO Facility (File 2011.050, 8.5 x 11)
2	UPCO Facility (Drawing 2011.050 C, D-size)
3	Utilities Map: Well & Septic System Locations (2011.052 A, D-size)
4	Plotted Well Locations & Topographical Map with Arizona Well Registry Report
5	UPCO Septic Systems, Wells, and Other Sites (size & location)
6	Solid Waste Management Units (2011.055 B, D-size)
7	UPCO Photographs (6)
8	Aerial Photograph of UPCO Facility

FILE (2011.050



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3	A 040 030 05 A C B WR 50495 SANDY B 800 8 800 B 10		E 07 P D W 03/11/983 127 BOX 1117-D BCS 1 PHOENIX 10 1 S T 756	10 X X AZ 85029 NW SW NE 05 040N 030E -
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5	A 040 030 05 A C C WR 52396 OLARI, PETE 504 8 504 P	8 1 C 06 06 D 186 03/23/989	D 07 P D W 03/17/989 355 4101 W UNION HILLS GLENDALE	10 X I AZ 85038 SW SW NE 05 040N 030E
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Ý	A 040 030 05 A C D WR 516340 SANDY, JAMES K 400 8 400 B	0 1 C 04 07 D 355 02/07/987	D 07 P D W 12/24/986 355 1313 E CHRISTY DR PHOENIX	10 X C AZ 85020
7	A 040 030 05 A C D WR 522493 MCGOUGH, MICHAEL 440 8 442 P 15	3 1 C 06 06 D 280 10/07/988	D 07 P D W 09/28/988 355 2302 W CORRINE PHOENIX 30 1 S T 20	10 X X AZ 85029 SE SW NE 05 040N 030E
8	A 040 030 05 A D A WR 520617 JOHNSTON, LEROY E 480 8 480 B 20	7 1 C 06 06 D SPACE 165 320 04/02/988	D 07 P D W 03/22/988 355 19301 N 7TH ST PHOENIX 15 1 T	10 X X AZ 85024 NE SE NE 05 040N 030E
9	A 040 030 05 A D B WR 504639 GALLAGHER, DANIEL 405 6 404 P	0 1 C 04 07 E 175 02/11/983	E 07 P D W 01/14/983 004 BOX 1139-B BCS I PHOENIX	35 X X X C AZ 85029 NW SE NE 05 040N 030E

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1	A 040 030 05 B A D WR 509693 1 PURRINGTON R A 366 5 366 B 14	C 06 07 D	D 07 P D W 11/16/984 355 15 X C 18602 N 12TH AVE PHOENIX AZ 85027 SE NE NW 05 040N 030E
1	A 040 030 05 B A D WR 523969 1 WESTWOOD, ALEX 340 8 340 P 14		D 07 P D W 03/17/989 355 10 X I 2403 W CAMPBELL PHOENIX AZ 85015 SE NE NW 05 040N 030E
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18	A 040 030 05 B C D WR 514515 1 RIES, FRED W 7 36	C 04 06 D O 06/16/986	D 07 P D W 06/04/986 289 10 X X 1117 BLACK CYN STG I PHOENIX AZ 85029 7 4 S S 60 SE SW NW 05 040N 030E
ļ	A 040 030 05 B D A WR 507122 1 7 SMITH R 400 DRY		D 07 P D U 02/03/984 355 10 X N PO BOX 30753 PHOENIX AZ 85046 05 040N 030E

WELL REGISTRY REPORT

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ARIZONA DEPARTMENT OF WATER RESOURCES WELL REPORT OPERATIONS DIVISION **** WELLS IN LEGAL DESCRIPTION ORDER ****

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ARIZONA DEPARTMENT OF WATER RESOURCES WELL REPORT OPERATIONS DIVISION **** WELLS IN LEGAL DESCRIPTION ORDER ****

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ARIZONA DEPARTMENT OF WATER RESOURCES WELL REPORT CODES OPERATIONS DIVISION

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QUAD: A = TOWNSHIP IS NORTH AND RANGE IS EAST C = TOWNSHIP IS SOUTH AND RANGE IS WEST
                                                       B = TOWNSHIP IS NORTH AND RANGE IS WEST
                                                     D = TOWNSHIP IS SOUTH AND RANGE IS EAST
           A QUARTER SECTION (160 ACRES)
OTR 2 IS A QUARTER OF A QUARTER SECTION (40 ACRES)
QTR 3 IS A QUARTER OF A QUARTER/QUARTER SECTION (10 ACRES)
OTR CODES: A = NE B = NW C = SW D = SE
             = WELL REGISTRATION NUMBER
WELL DEPTH = THE DEPTH OF THE WELL IN FEET
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WATER LEVEL = DISTANCE IN FEET FROM THE SURFACE TO WATER
             = WATER OUTPUT IN GALLONS PER MINUTE
DATE DRILLED - DATE WELL WAS DRILLED
DRL LIC NO. = THE DRILLERS DWR LICENSE NUMBER
 WATER USE CODES:
                                                                                                   H=SUBDIVIS
                                                                     F=INDUSTR G=RECREAT
                                                         E=MUNIC
            B-UTILITY C-COMMERICAL
                                          D=DOMESTIC
A=IRRIG
                                                                                 O= OTHERS(NON-PRODUCTION)
                                                         M=MONITOR
                                                                     N=NONE
             J=STOCK
                         K=OTHER
                                          L=DRAINAGE
I=MINE
R=RECHARGE T=TEST
                                                                   P = PRIVATE S = STATE W = WATER DIST
LAND OWNER: C = COUNTY F = FEDERAL M = CITY N = CORP
 WATERSHED CODES:
                                                                  04 = BILL WILLIAMS
                                                                                              05 = VERDE RIVER
                   02 = COLORADO
                                        03 = LITTLE COLORADO
01 = VIRGIN
                                                                  U8 = UPPER GILA
                                                                                              09 = SANTA CRUZ
                   07 = SALT RIVER
                                      L8 = LOWER GILA
06 = AGUA FRIA
                                                                  13 = WHITE WATER DRAW
                                                                                              14 = RIO YAOUI
                   11 = SAN PEDRO
                                        12 = WILLCOX PLAYA
10 = SAN SIMON
                            CRT = COMPLETION REPORT (PUMP, ETC.)
LOG = LOG OF WELL
 LOG AND CRT CODES:
R = WELL REGISTRATION (NO LOG OR COMPLETION REPORT IN FILE)
X = LOG OR CRT IS IN FILE
I = LOG OR CRT NOT IN FILE YET
N = LOG OR CRT NOT REQUIRED
C = LOG OR CRT CONSIDERED COMPLETE
 WELL USE:
                                                                                             G = GEOTECHNICAL
                                                                   D = DRAINAGE
                    B = GROUNDING
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A = ANODE
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                                                                   T = TEST
O = MONITOR
                    R = RECHARGE
                                          Z = DESTROYED
W = WATER PROD.
                   X = WATER DISP.
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                                                                                                  N = NON-DOMESTIC
                                    E = EXEMPT
D = DOMESTIC
                                                                                                  T = NON-SERV PERMIT
                                                                     S = SERV PERMIT
                                    O = NEW/REPLAC PERMIT'
P = GROUND WITHDRAWAL PERMIT
                                    Z = EXPLORATION
X = MONITOR/PIEXOMETER
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SEPTIC SYSTEMS

SYSTEM NO.	BUILDING	SEPTIC TANK SIZE (GALLONS)	<u>LEACH</u> <u>FIELD</u> <u>AREA/VOL</u> (Ft ² /Ft ³)	LATITUDE ¹ (Deg. Min. Sec)	LONGITUDE ¹ (Deg, Min, Sec)
A-1	Administration	2000	2500/12500	33,42,44	112,04,24
A-2	Operations 1	3200	3000/15000	33,42,44	112,04,19
A-3	Operations 2	1000	2500/12500	33,42,45	112,04,17
B-1	Assy X-Ray Waste (Industrial APP	500 AZ 102500)	1000/5000 ²	33,42,50	112,04,18
B-8	CAD Assy	750	500/2500 ²	33,42,49	112,04,20
B-10	Shipping/ Maintenance	1000	1500/7500 ²	33,42,49	112,04,22
B-12	Load	None	200/800 ²	33,42,49	112,04,22
B-15	System Assembly	2000	1800/9000	33,42,52	112,04,16
B-19	EED Assy	1000	2080/10400	33,42,47	112,04,16
C-2	Liner/ Weighout	1000	1500/7500 ²	33,42,52	112,04,05
C-11	QC Lab (Closed)	None	500/2000 ²	33,42,50	112,04,06

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SEPTIC SYSTEMS (CONTINUED)

SYSTEM NO.	BUILDING	SEPTIC TANK SIZE (GALLONS)	LEACH FIELD AREA/VOL (Ft ² /Ft ³)	LATITUDE ¹ (Deg, Min, Sec)	LONGITUDE ¹ (Deg, Min, Sec)
D-1	Test	500	1000/5000 ²	33,43,00	112,03,54
F-6	Extruder	1000	1000/5000	33,42,57	112,04,07

NOTES:

Accuracy ±1 second Estimated

-		UPCO WELLS						
	Drinking Water	B-10 (near)	33,	42,	48	112,	04,	25
	Unused Well	B-6 (near)	33,	42,	50	112,	04,	22
		OTHER SITES AT UPCO						
	Thermal Treatment Unit (TO4)	D-6	33,	42,	56	112,	04,	05
	OBOD	South of Propellant Plant 1	33,	42,	48	112,	04,	09
	Waterbore	D-4 (near)	33,	42,	56	112,	04,	03

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No change.

XII. Process - Codes and Design Capacities :

- A. PROCESS CODE Enter the code from the list of process codes below that best describes each process to be used at the facility.

 Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the first of codes below. Then describe the process finclying its design capacity) in the space provided in hem 2011.
- B. PROCESS DESIGN CAPACITY For each code entered in column A enter the capacity of the proc
- 1. AMOUNT -Enter the amount. In a case where design capacity is not applicable fresh at in a cloud enforcement action) enter the lotal amount of waste for that process limit.
 2. UNIT OF MEASURE For each amount entered in column 5(1), enter the code area the list of the lines describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS Enter the total number of units used with the corresponding

1	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF ME	IIT OF ASURE ODE
	the state of the s	(a) - (b) - (c) - (c) - (d) -	Service of the servic	
. 7 : 2	DISPOSAL:	The second second second	GALLONS	G
79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY;	BE TO THE STATE OF THE STATE OF	
	Tara at the last of the last o	OR LITERS PER DAY	GALLONS PER HOUR	
80	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER DAY	. U
81	LAND APPLICATION	ACRES OR HECTARES	UTERS	
82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	J UIDIS	. L
83	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER HOUR	. H
	STORAGE:		I ITTERS OFF THE	
01	CCNTAINER	GALLONS OR LITERS	LITERS PER DAY	. Y
	(barrel, drum, etc.)		SHORT TONS PER HOUR	. D
02	TANK	GALLONS OR LITERS		
03	WASTE PILE	CUBIC YARDS OR CUBIC METERS	METRIC TONS PER HOUR	. n
04	SURFACE IMPOUNDMENT	GALLONS OR LITERS	SHORT TONS PER DAY	. N
	TOCATIVE UT.		THE TOUR SET BUY	•
	IFEATMENT:	CALLONS DED DAY OF LITTER AND A	METRIC TONS PER DAY	. 3
01	TANK SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUR	. 3
02 03	INCINERATOR	GALLONS PER DAY OR LITERS PER DAY SHORT TONS PER HOUR; METRIC		
03	INCINENATOR	TONS PER HOUR; GALLONS PER HOUR:	KILOGRAMS PER HOUR	. R
.:	***	LITERS PER HOUR: OR BIU'S PER HOUR	CUBIC YARDS	. Y
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04	OTHER TREATMENT	GALLONS PER DAY: LITERS PER DAY:	CUBIC METERS	
		POUNDS PER HOUR; SHORT TONS PER	ACRES	. B
	(Use for physical, chemical, thermal or biological treatment	HOUR; KILOGRAMS PER HOUR; METRIC	3	
	processes not occurring in	TONS PER DAY; METRIC TONS PER	ACRE-FEET	.A 17
	lanks, surface impoundment or incinerators. Describe the	HOUR, OR SHORT TONS PER DAY	HECTARES	. 0
*	processes in the space			
	provided in Hem III.)		HECTARE-METER	. F
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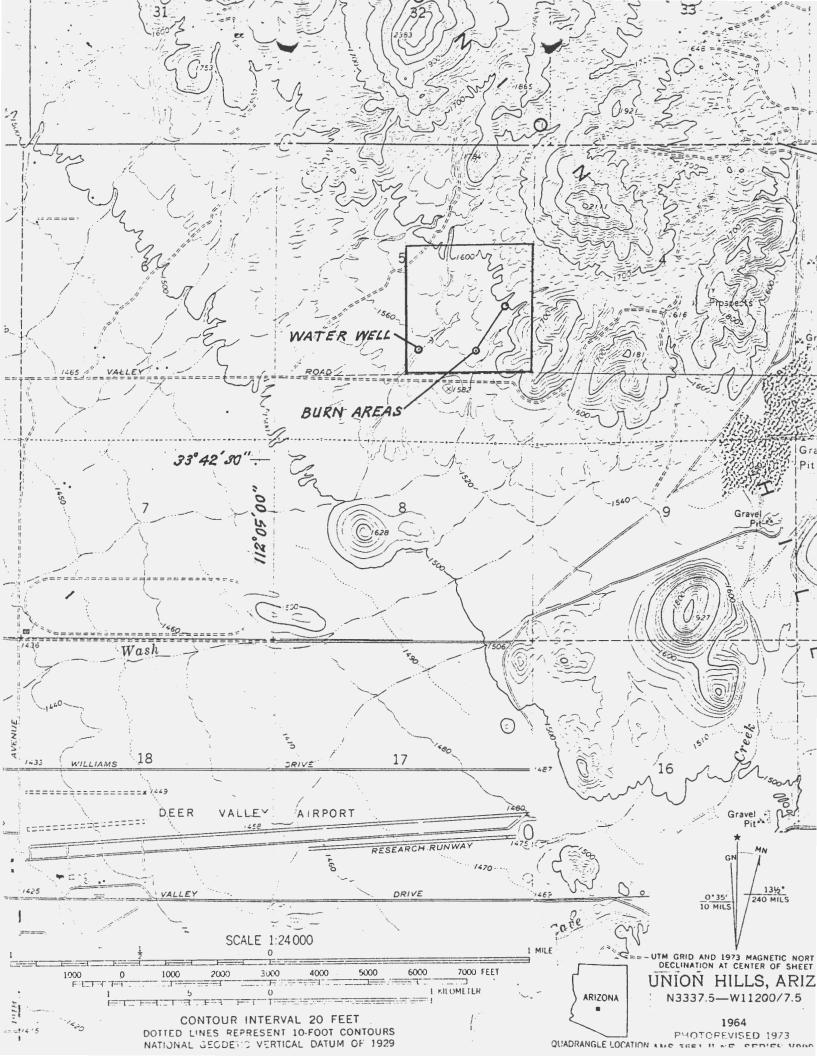
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	70°	7	D D	0	0		50,000	P	T	0	4			-	-	-		Thermal treatment by burning waste propellant & oxidizers
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TIT	DD	OCES	CEC	(continued)
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- C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TOT"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.
 - T04 Open burning of waste explosives: 2,000 pounds (approx. 140 gallons) per month, estimated maximum generated, of waste composite solid propellant and waste oxidizers.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste (s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE CODE	ı
POUNDS	P	KILOGRAMSK	
TONS. , . ,	T	METRIC TONS	

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

- 1. PROCESS CODES:
 - For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2, In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous weste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT		D. PROCESSES								PROCESSES			
Zo	HAZARD. WASTENO (enter code)		OF MEA- SURE (enter code)		1. PROCESS CODES (enter)								ODE	ES		2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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X-2	D 0 0 2	400	P	1	T	0	3	L)	8	0			1	1 1	
X-3	D 0 0 1	100	P	1	T	0	3	I)	8	0			1		
X-4	D 0 0 2			T	7				T	T			T			included with above

Continued from page 2.

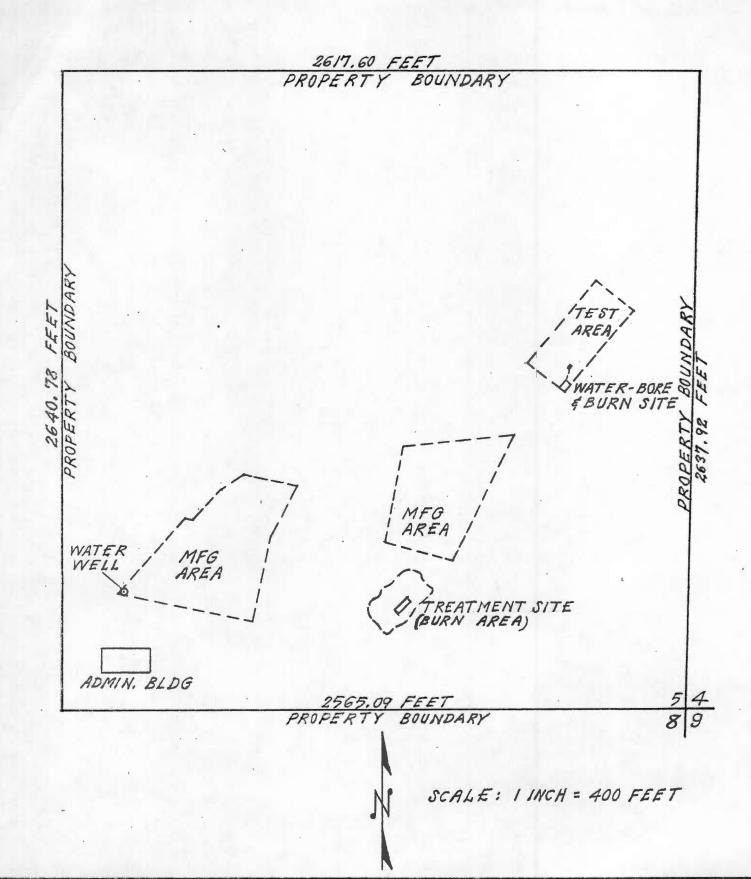
NOTE: Photocopy this page before completing if you ve more than 26 wastes to list.

Form Approved OMB No. 158-S80004

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VI. PHOTOGRAPHS	i page 5 a scale drawing of the facility isee insta	actions for mor	e ustani.					
All existing facilities must include photographs (ae treatment and disposal areas; and sites of future sto	rial or ground—level) that clearly delineat	e all existing s	tructure	s; exist	ing s	torag	ge,	
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submitted information is true, accurate, and complined including the possibility of fine and imprisonment.		penaities for s	upmittii	ng raise	Inro	ırmaı	tion,	
A. NAME (print or type)	B. SIGNATURE		TOOTY	TE SIGN			***************************************	
H. G. Watson President & General Manager	Till alson		13	Leb	19	87		
X, OPERATOR CERTIFICATION	70000	E STEIN		0700	100			
I certify under penalty of law that I have personall	y examined and am familiar with the info	rmation subm	itted in	this an	d all	attac	ched	
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V, FACILITY DRAWING (see page 4)



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Form Approved OMB No. 2000-0098

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EPA Form 8700-12 (6-85) REVERSE

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INSTRUCTIONS: Complete A through J to det questions, you must submit this form and the su if the supplemental form is attached. If you and is excluded from permit requirements; see Section	upplemental fo wer "no" to ea	rm listed in tach question,	the parenthesis following the you need not submit any of	question. Mark "X" in the box in these forms. You may answer "no	the th	our a	olumn
SPECIFIC QUESTIONS		MARK 'X'		C QUESTIONS			FORM
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X. EXISTING ENVIRONMENTAL PERMITS	PLASTIC PROPERTY OF THE PROPER
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15 16 17 10 - 30 16 16 17 18	Facility Permit
XI. MAP	Raines, a " Handida domina al Maria (" Maria (m. 1911).
Attach to this application a topographic map of the area extending t the outline of the facility, the location of each of its existing and p	roposed intake and discharge structures, each of its hazardous waste
treatment, storage, or disposal facilities, and each well where it injury water bodies in the map area. See instructions for precise requirement	cts fluids underground. Include all springs, rivers and other surface
XII. NATURE OF BUSINESS (provide a brief description)	
Design, develop & manufacture military aircraft	t ejection seats and related components for
emergency escape and survival, including the	
XIII. CERTIFICATION (see instructions)	
	om familiar with the information submitted in this application and all
attachments and that, based on my inquiry of those persons imp	rediately responsible for obtaining the information contained in the
false information, Including the possibility of fine and imprisonment.	nplete. I am aware that there are significant penalties for submitting
A. NAME & OFFICIAL TITLE (type or print) B. SIGNAT	
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President & General Manager	KIWakon > 13 kb 1987
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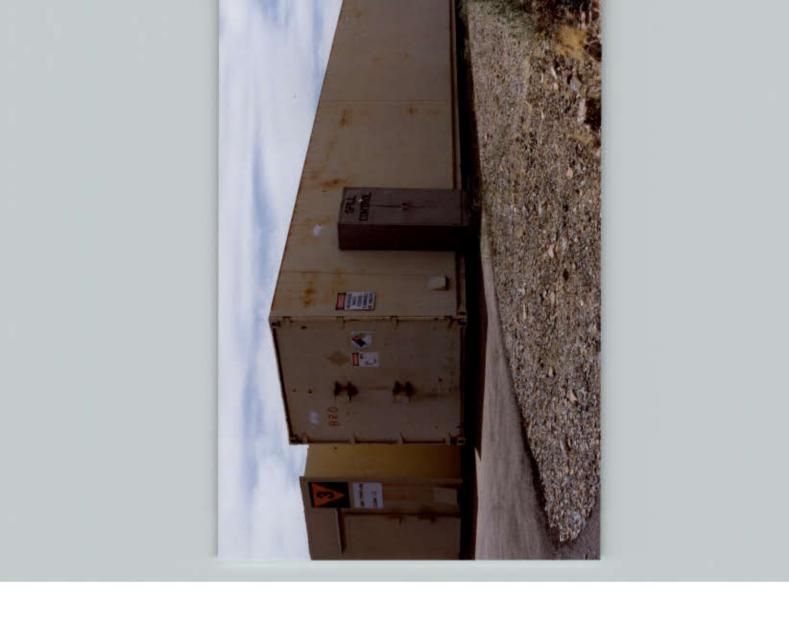
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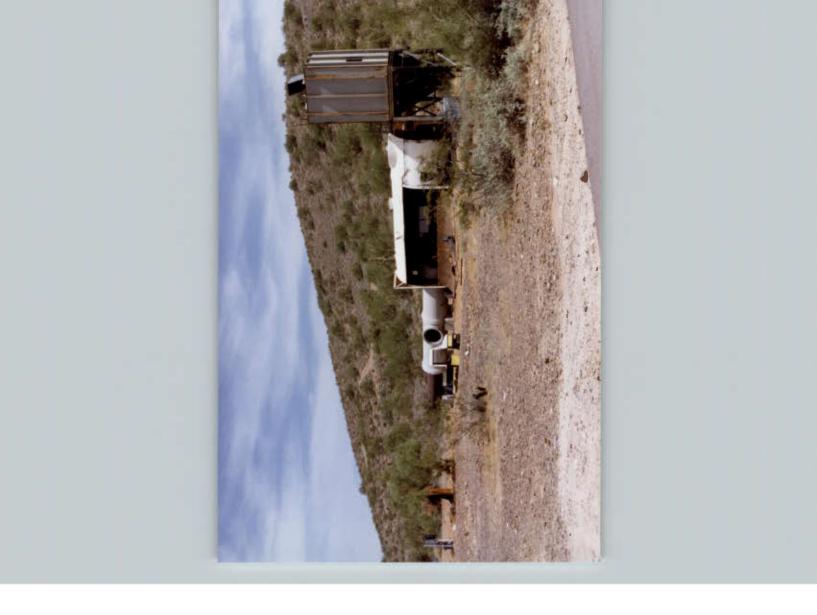
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Location: E-1

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

FIFE SYMINGTON, GOVERNOR EDWARD Z. FOX, DIRECTOR

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 15, 1992

John F. Huber Vice President, Administration Universal Propulsion Company, Inc. 25401 North Central Avenue Phoenix, AZ 85027-9801

Re: Installation Permit No. 78004

Thermal Treatment System

Permit Fee: \$517.00

Dear Mr. Huber:

Note:
AZDEQ gave me
a wrong Address.
Returned sh
17 Syp 92.
remailed 17 Syp 92.

Stave miller

Enclosed is an Installation Permit for the referenced facility. In accordance with Arizona Revised Statutes §49-430, this permit should be readily available at all times on the operating premises.

Based on calculation of the time spent in technical review, public notifications and hearings, the fee is listed above. Your remittance should be received by August 17, 1992 or your permit may be subject to revocation. To ensure proper credit, please make your check payable to the Arizona Department of Environmental Quality and remit with a copy of this letter in the enclosed envelope to:

Arizona Department of Environmental Quality Accounts Receivable P.O. Box 600 Phoenix, Arizona 85001-0600

ATTENTION; JANE THOMPSON

Please be aware that any changes in plans, specifications or field construction may affect your permit status. The Office of Air Quality must be notified of any proposed changes before you proceed with implementation of any such changes; they may require an amendment to this permit.

This Installation Permit does not allow you to operate your equipment; you will need an Operating Permit (A.A.C. R18-2-306). Accordingly, enclosed are instructions and an Application for Operating Permit.

If you have any questions, please do not hesitate to contact the Permits Unit, Office of Air Quality at (602) 207-2338.

Sincergly,

Nancy C. Wrona
Assistant Director
for Air Quality

NCW:SJ

Enclosures_The Department of Environmental Quality is An Equal Opportunity Affirmative Action Employer.

Post Office Box 600

Phoenix, Arizona 85001-0600

Recycled Paper

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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF AIR QUALITY

OFFICE OF AIR QUALITY
P.O. Box 600 - Phoenix, AZ 85001-0600 - Phone:

INSTALLATION PERMIT

(602-207-2338

(As required by Title 49, Chapter 3, Article 2, Section 49-426, Arizona Revised Statutes and Chapter 2, Article 3, Arizona Administrative Code)

. PERMIT TO BE ISSUED TO (B)	siness license name of organization	on that is to receive permit)	A PART A CONTRACT OF THE PART A CONTRACT OF T	
Universal Prop	ulsion Company,	Inc.		
. NAME (OR NAMES) OF OWN	ER OR PRINCIPALS DOIN	G BUSINESS AS THE ABOVE OR	GANIZATION	
Universal Prop	ulsion Company,	Inc.		
. MAILING ADDRESS	25	401 N. Central Avenue		
	NUME	SER STREET		
	Phoenix	AZ	85027-9801	
	CITY OR COMMUNITY	STATE	ZIP CODE	
. EQUIPMENT LOCATION ADD				
	NUM	BER STREET		
	Phoenix city or community	AZ STATE	85027-9801 ZIP CODE	
. FACILITIES OR EQUIPMENT [DESCRIPTION Hazai	dous Waste Thermal T	reatment System	

. THIS PERMIT ISSUED SUBJE	CT TO THE FOLLOWING	conditions contain	ned in Attachments A,	B and C
		, , , , , , , , , , , , , , , , , , ,		
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. ADEQ PERMIT NUMBER	78004		PERMIT CLASS	
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	CICNATURE	Assistant	Director	****
	SIGNATURE	TITLE		

The issuance of this permit shall in no way be construed as a warranty affirmation or indication that the equipment described herein will qualify for an operating permit. It is the sole responsibility of the applicant to comply with all applicable air pollution laws, regulations and standards.

ATTACHMENT "A"

General Provisions

Installation Permit No. 78004 For

UNIVERSAL PROPULSION COMPANY, INC.

I. Permit Expiration

This Installation Permit shall be canceled (1) if construction is not commenced (as defined in A.A.C. R18-2-101.23) within 18 months after the date of issuance of the permit, (2) if construction is discontinued for a period of 18 months or more, or (3) if construction is not completed within five years of the date of issuance of the permit.

II. Notification of Commencement of Construction and Startup

The Department shall be notified in writing of the anticipated date of initial start-up (as defined in A.A.C. R18-2-101.92) of each facility of the source not more than sixty (60) days nor less than thirty (30) days prior to such date and shall be notified in writing of the actual date of commencement of construction and start-up within fifteen (15) days after such date.

III. Facilities Operation

All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this Installation Permit shall at all times be maintained in good working order and be operated as efficiently as practicable so as to minimize air pollutant emissions.

IV. Malfunction

The Department shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Attachment "B" and "C" of these conditions. In addition, the Department shall be notified in writing within fifteen (15) working days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Attachment "B" and "C" of these conditions, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of this permit, any statute, rule or regulations which such malfunction may cause except as provided in A.A.C. R18-2-309.

V. Right to Entry

The authorized representatives of the Department, upon the presentation of credentials, shall be permitted at reasonable times:

A. to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions

of this Installation Permit; and

- B. to have access to and copy any records required to be kept under the terms and conditions of this Installation Permit; and
 - C. to inspect any equipment, operation, or method required in this Installation Permit; and
 - D. to sample emissions from the source.

VI. Transfer of Ownership

This Installation Permit is non-transferable whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. The applicant shall notify the succeeding owner and operator of the existence of this Installation Permit and its conditions and need to obtain a new permit from the Department by letter, a copy of which shall be forwarded to the Department.

VII. Severability

The provisions of this Installation Permit are severable, and, if any provision of this Installation Permit is held invalid, the remainder of this Installation Permit shall not be affected thereby.

VIII. Other Applicable Regulations

The owner and operator of the proposed project shall construct and operate the proposed stationary source in compliance with all other applicable provisions of A.A.C. Title 18, Chapter 2 and all other applicable Federal regulations.

IX. Representations in Application for Permit and Exemption.

All representations with regard to construction plans and operation procedures in the application for a Installation permit become conditions upon which a subsequent Installation Permits, Operating Permits are issued. Any variance from such representation if the change will cause a change in the method of control of emissions, the character of the emissions, or will result in an increase in the discharge of the various emissions, will be considered violation of this permit unless permittee first makes application to the Department in that regard and such amendment or new installation permit is approved by the Department.

X. Allowable Emissions

Permittee is authorized to discharge or cause to discharge into atmosphere emissions of air contaminants from only those facilities that are listed in the Attachment "C", unless otherwise such emissions are authorized under separate Installation or Operating Permit.

XI. Operation of the Equipment

This permit authorizes the temporary operation of the proposed facility for a period of ninety days following installation. All tests, analyses or gathering of information necessary to comply with the installation permit or to qualify for an operating permit shall be gathered during the ninety-day period. The permittee can request extension of the term of temporary operation for up to ninety additional days.

ATTACHMENT B

Special Conditions

Installation Permit No.78004 (Thermal Treatment Unit) UNIVERSAL PROPULSION CO., INC.

I. Applicable Rules

UNIVERSAL PROPULSION COMPANY (Permittee) shall install this Thermal Treatment Unit (TTU) in compliance with all applicable provisions of AAC R18-2-504 and -804.

II. Emission Limits

A. On and after the date of startup of the TTU, Permittee shall not discharge or cause the discharge into the atmosphere from the exhaust stack the following pollutants in excess of the following specified limits:

Pollutant

Average Emission Limit

Particulate matter

0.08 gr/dscf @12% CO,

Hydrogen chloride

20 lb/hr

Unless otherwise specified, the above emission limits shall be measured on a one-hour average (the average of three one-hour test runs).

- B. On and after the date of startup, Permittee shall not cause to be discharged into the atmosphere from the exhaust stack any gases which exhibit greater than 20 percent opacity.
- C. The total emissions of air contaminants from any of the sources shall not exceed the values stated on Attachment C, "Maximum Allowable Emission Rates".

III. Stack Sampling Facilities

For performance test purposes, sampling ports, platforms, and access shall be provided by Permittee in accordance with the Arizona Testing Manual for Air Pollutant Emissions.

IV. Performance Tests

- A. Within 60 days after achieving the maximum operating rate of the TTU, but no later than 180 days after initial startup (as defined in A.A.C.R18-2-101.92), Permittee shall conduct or cause to be conducted performance tests (as required by R18-2-312) on the TTU for particulate matter and for hydrogen chloride. Permittee shall furnish the Department a written report of such tests within thirty (30) days. All performance tests shall be conducted based on a representative waste sample and at maximum operating capacity. Upon receipt of prior written approval from the Department, Permittee may conduct performance tests at less than the maximum operating capacity.
- B. Performance tests for the emission of particulate matter shall be conducted and results reported in accordance with the test methods set forth in A.A.C. R18-2-804, using EPA Method 5; for the emission of hydrogen chloride, EPA Method 26.
- C. A pre-test meeting shall be arranged with the Department at least fourteen (14) days prior to such test to allow time for the development of an approved performance test plant and to arrange for an observer to be present at the test. Permittee shall prepare and submit a written copy of the proposed test plan to the Department seven (7) days prior to pretest meeting. A written copy of the final test plan must be submitted to the Department prior to performance testing. Such prior approval will minimize the possibility of Department's rejection of test results for procedural deficiencies.

V. Type of Waste to be Burned

Permittee is permitted to burn propellant scraps consisting of mixtures of ammonium perchlorate, potassium perchlorate, aluminum powder, iron oxide powder, polybutadiene, polysulfide, plasticizers, and curatives, but only in such manner that the limits in Attachment C are not exceeded.

VI. Operating Conditions

- A. The TTU may operate for a maximum of 6 hours a day, and no more than a total of 555 hours per year. Waste feed rate shall not exceed 90 lb/hr.
- B. Permittee shall record the daily charging rates, type of waste, and period of each burn operation in a log book. The log book shall be available for inspection upon request by Department representatives.

ATTACHMENT C

Maximum Allowable Emission Rates

UPCO - Thermal Treatment Unit

Compound	<u>lb/hr</u>	ton/yr
Magnesium oxide	0.38	0.42
Carbon sufoxide	0.15	0.04
Carbon monoxide	11.8	3.26
Hydrogen sulfide	2.5	0.69
Hydrogen chloride	20.0	5.55
Alumina	2.3	0.64
Ferrous chloride	3.0	0.83
Potassium chloride	3.5	0.97

Xy p. subsequent natification (complete item C)

IX. DESCRIPTION OF HAZARDOUS WASTES
Please go to the reverse of this form and provide the requested information.

A. FIRST HOTIFICATION

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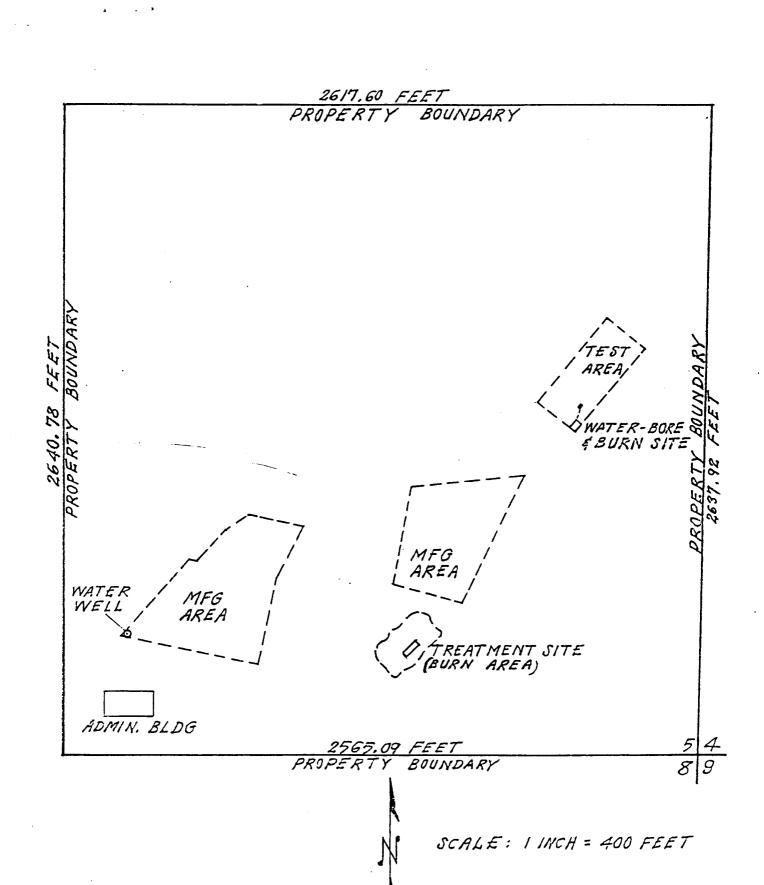
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IX DESC	RIPTION O	F HAZARDOUS WAS	TES (continued from front)				35000
A HAZAF	DOUS WAST	es from non-specif	C SOURCES. Enter the four-	digit number from 40 Cr	R Part 281.31 for	each listed hazardous	
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	23	23 7 25	39	40	41	62	
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			P - 34				
CLUNTE	INFECTIOU	S WASTES. Enter the lo	r-digit number from 40 CFR	Pers 281.34 for each lists	d Inszerdous waste	from hospitals, voteri	ElstA
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K. CERT	15ICATION						
Iscart(f)	vunder pena	ity of law that I have	personally examined and	on familiar with the	information sub	mitted in this and	all
e deden	that be	Smitte d Information t	y inquiry of those individu strue, accurate, and comp	ese. I am aware that	eriale jar oblai Siere are signifi	ning the informati ant penalties for s	ub-
mitting,	folce informa	ision, including the poi	sibility of fine and impriso	nment.		-	ľ
SIGNATU	RE /	/ /	H. G. Watso	L TITLE (type or print)		DATE SIGNED	
	A STORE	have		"General Manage	er	13 February	87
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EPA Form 8700-12 (6-85) REVERSE

V. FACILITY DRAWING (see page 4)



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Continued from the front.

11	PR	OC	ESSES	(continued)	ł

. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TO4"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

104 Open burning of waste explosives: 2,000 pounds (approx. 140 gallons) per month, estimated maximum generated, of waste composite solid propellant and waste oxidizers.

IV. DESCRIPTION OF HAZARDOUS WASTES

- a. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- 3. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate coder are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed listardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA	B. ESTIMATED ANNUAL	c.	C. UNIT		D. PROCESSES									D. PROCESSES	
Zó	HAZARD. WASTENO (enter code)		S	URE enter ode)	-			1.	. Pf			is co er)	ODE	5		2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$)
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X-2	D 0 0 2	400		P		T	0.	3	D^{T}	8	0	1	1.		! 1	
X-3	D0001	100		P		T	0.	3 .	$D^{'}$	8.	0	1	1 "		1 1	
X-4	D002					T	1		1	1			1		1 1	included with above

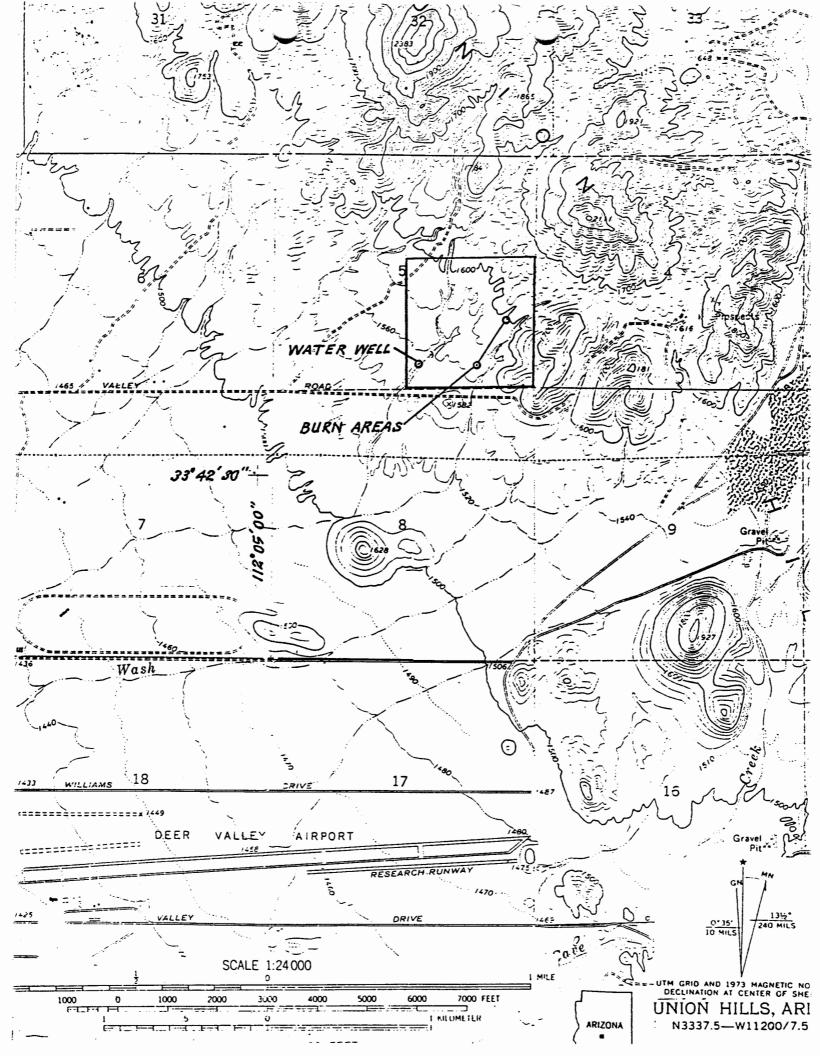
Contin	Continued from page 2. NOTE: Photocopy this page before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-S80004																								
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3														,		1	1	-		ī		,	ī		and waste oxidizers.
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EPA I.D. NO. (enter from page 1)									
F A Z U 9 8 U 8 1 4 4 7 9 6									
V. FACILITY DRAWING				domi					
All existing facilities must include in the space provided on p	age 5 a scale draw	and of the facility (see Institu	Cuons for more			1000			*
All existing facilities must include photographs (aeria	l or ground—le	vel) that clearly delineate	all existing s	tructur	es; exis	ting st	orage,		
trea* Int and disposal areas; and sites of future stora VII. JILITY GEOGRAPHIC LOCATION	ige, treatment o	or disposal areas (see insti	uctions for m	ore de	taii).				
LATITUDE (degrees, minutes, & seconds)	the state of the s	LONG	ITUDE (degree	s, minu	tes, & se	conds)	*************	-	
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VIII. FACILITY OWNER	nesalty serv		72 - 72	75 76	77 17	T Dega			
A. If the facility owner is also the facility operator as lissing to Section IX below.	,		ormation", plac	e an "X	" in the	box to	the left	t and	
B. If the facility owner is not the facility operator as lis	sted in Section VI	II on Form 1, complete the	following item	s:		- 000011			
1. NAME OF FACIL	ITY'S LEGAL O	WNER		2	. PHON	E NO. (area co	de & n	0.)
E		***					_ - _		
3. STREET OR P.O. BOX		4. CITY OR TOWN		55 54 5. ST.	- 58		P COD	2 <u>-</u> E	
F!	Ĝ						TT		
IX. OWNER CERTIFICATION	49 15 16	**************************************			4	rasili	333		41
I certify under penalty of law that I have personally of	examined and a	m familiar with the infor	mation subm	itted ii	this a	nd all a	ittache	ed	2
documents, and that based on my inquiry of those in submitted information is true, accurate, and complet	dividuals imme	diately responsible for or	btaining the in	nfo rm a	tion, I	believe	e that t	the	
including the possibility of fine and imprisonment.	c. I alli awale (i	iat there are significant p	ieriaities for s		nig rais	. ,,,,,,,,		··,	
A. NAME (print or type)	B. SIGNATURE	. / /			TE SIG				
H. G. Watson President & General Manager	The state of	Walson -		1	3 Les	1198	37		
X, OPERATOR CERTIFICATION									
I co under penalty of law that I have personally of	examined and a	m familiar with the info	mation subm	itted i	n this a	nd all a	attachi	ed	*****
docents, and that based on my inquiry of those in submitted information is true, accurate, and complet including the possibility of fine and imprisonment.	dividuals imme e. I am aware t	diately responsible for o hat there are significant p	btaining the i อลกalties for s	nforma ubmiti	ition, l ing fals	believe se infoi	that rmatio	the n,	
A. NAME (print or type)	8. SIGNATURI	· · · · · · · · · · · · · · · · · · ·		C. D	ATE SIG	SNED			_
EPA 5 2510 2 (5 90)				1		CONT	TINUE	ON PA	Ğ

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTI continued)

E. USE THIS SPACE TO LIST ADDITIONAL OCESS CODES FROM ITEM D(I) ON PARTICLE OF THE PROPERTY OF



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			d Permits F structions	rogram ' before starting.)	FAZD98081			9
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FACILITY MAILING ADDRESS PI FASE	PLACE	· 1 A	BFI IN	THIS SPACE	left of the label space list that should appearl, please	prov	ide i	t in the
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I LOCATION	,	\ \	///	/////	items if no label has been the instructions for detail	provid	led.	Refer to
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	CHO POSSO	en anti-	ON VESTAL TREATMENT		Which this data is collected.	****	eggan.	MANY CARS
					forms to the EDA. If you are		· · ·	A PROPERTY OF
INSTRUCTIONS: Complete A through J to determine questions, you must submit this form and the supple	mental fo	er yu	isted in the	submit any permit application parenthesis following the ques	tion. Mark "X" in the box in t	the th	ind co	olumn
if the supplemental form is attached. If you answer 'is excluded from permit requirements; see Section C o	'no" to e	ach d	luestion, y	ou need not submit any of these	forms. You may answer "no"	" if yo	eur ac	tivity
	rie mzn		IN ORR BIZ	o, section of the histochons	iot estitutions of pour_teres		MAR	K 'X'
SPECIFIC QUESTIONS	YES		FORM	SPECIFIC Q		YES	*0	ATTACH
A. Is this facility a publicly owned treatment we which results in a discharge to waters of the U		X		B. Does or will this facility (a include a concentrated as	nither existing or proposed) nimal feeding operation or		v	
(FORM 2A)				equatic animal production discharge to waters of the	facility which results in a J.S.? (FORM 2B)	19	χ	21
. Is this a facility which currently results in discha- to waters of the U.S. other than those described		17 X	19	D. Is this a proposed facility	other than those described	1,9		
A or B above? (FORM 2C)	22	â	24	waters of the U.S.? (FORM	vill result in a discharge to 2D)	25	χ 26	27
. Does or will this facility treat, store, or dispose	of			F. Do you or will you inject municipal effluent below	at this facility industrial or the lowermost stratum con-			
hazardous wastes? (FORM 3)	X				ter mile of the well bore,		Х	
you or will you inject at this facility any produ	ced	29	39	H. Do you or will you inject		21	32	33
water or other fluids which are brought to the sur in connection with conventional oil or natural gas (oro-	X		cial processes such as mir	ing of sulfur by the Frasch of minerals, in situ combus-		Х	1
duction, inject fluids used for enhanced recovery oil or natural gas, or inject fluids for storage of lic				tion of fossil fuel, or reco	very of geothermal energy?			
hydrocarbons? (FORM 4) Is this facility a proposed stationary source which) is	30	26	J. Is this facility a proposed	stationary source which is	37	3.8	39
one of the 28 industrial categories listed in the structions and which will potentially emit 100 to	in-	X		NOT one of the 28 indus	trial categories listed in the lipotentially emit 250 tons		х	
per year of any air pollutant regulated under	the				nt regulated under the Clean		^	
Citizen Air inches and many affects on he impressed in				A :- A		1 1	1	
Clean Air Act and may affect or be located in attainment area? (FORM 5)		41	42	Air Act and may affect or area? (FORM 5)	De located in an attainment	43	44	45
attainment area? (FORM 5)		41	1		be located in an attainment		17.54	
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A. NAME & TITLE (LOW FACILITY SKIP UNIVERSAL PROP 14 - 29 30 C. FACILITY CONTACT A. NAME & TITLE (LOW FACILITY MAILING ADDRESS A. STREET OR INTERVENTING ADDRESS A. STREET OR INTERVENTING ADDRESS A. STREET OR INTERVENTING ADDRESS B. CITY OR TOWN PHOENIX 14 15 16 17 18 19 19 19 19 19 19 19 19 19	U L Stringt, &	title	O N L I T	T A G E 1 A 7 8 5 0 2 0	I.N.C. PHONE (area code & no.) 2 8 6 9 8 0 6 7 55			
A. STREET, ROUTE NO. OR OTHER	U L Stringt, &	title	O N L I T	T A G E 1 A 7 8 5 0 2 0	I.N.C. PHONE (area code & no.) 2 8 6 9 8 0 6 7 55			
A. NAME & TITLE (LOW FACILITY SKIP UNIVERSAL PROP 119-29-39 (FACILITY CONTACT A. NAME & TITLE (LOW FACILITY MAILING ADDRESS A. STREET OR IN B. CITY OR TOWN A. STREET, ROUTE NO. OR OTHER A. STREET, ROUTE NO. OR OTHER B. COUNTY NAME B. COUNTY NAME	U L Stringt, &	title	O N L I T	T A G E 1 C.STATE D. ZIP CODE A Z 8 5 0 2 SER	I.N.C. PHONE (area code & no.) 2 8 6 9 8 0 6 7 55			
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HALLAS, WILLIAM FACILITY MAILING ADDRESS A. STREET OR INTERCENT OF THE PROPERTY OF THE PROPE	U L Stringt, &	title	O N L I T	TAGE 1	I.N.C. PHONE (area code & no.) 2 8 6 9 8 1 6 7 33			

. SIC CODES (4-digit, in order of priority)	
A, FIRST	B. SECOND .
3.7.2.8 Military Aircraft Ejection Se	eats 7 2.8.9.2 Solid Propellant (Explosives)
C. THIRD	D. FOURTH
(specify)	(specify)
I. OPERATOR INFORMATION	
	AME B. is the name listed in the
UNIVERSAL PROPULSION	N COMPANY, INC.
C. STATUS OF OPERATOR (Enter the appropriate letter into	to the answer box; if "Other", specify.) D. PHONE (area code & no.)
F = FEDERAL M = PUBLIC (other than federal or state)	O Lawrence Universe Place Sl.
S = STATE O = OTHER (specify) P = PRIVATE	on leased state land A 6 0 2 8 6 9 8 0 6 7
E. STREET OR P.O. BOX	
ox 1140 Black Canyor	n Stage 1
F, CITY OR TOWN	G.STATE H. ZIP CODE IX, INDIAN LAND
Phoenix	A Z 8 5 0 2 9 Is the facility located on Indian lands?
	40 41 42 47 - 51
EXISTING ENVIRONMENTAL PERMITS	· 中国の大学の大学の大学の大学の大学の大学の大学の大学の大学の大学の大学の大学の大学の
	ir Emissions from Proposed Sources)
N 9P	
16 177 10 - 30 16 16 17 18	
B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
U 9 A E	B 8 7 0 1 2
16 17 16 - 30 16 17 16	Dept Burning Permit
RCRA (Hazardous Wastes)	E. OTHER (specify) (specify) Arizona State Solid Waste
76 17 16 - 30 16 16 17 18	Facility Permit
tiach to this application a topopraphic map of the eres ev.	ktending to at least one mile beyond property bounderies. The map must show
ne outline of the facility, the location of each of its exist	ting and proposed intake and discharge structures, each of its hazardous waste
ne outline of the facility, the location of each of its exist eatment, storage, or disposal facilities, and each well wh	ting and proposed intake and discharge structures, each of its hazardous waste here it injects fluids underground. Include all springs, rivers and other surface
ne outline of the facility, the location of each of its exist eatment, storage, or disposal facilities, and each well who water bodies in the map area. See instructions for precise re-	ting and proposed intake and discharge structures, each of its hazardous waste here it injects fluids underground. Include all springs, rivers and other surface equirements.
ne outline of the facility, the location of each of its exist reatment, storage, or disposal facilities, and each well where the bodies in the map area. See instructions for precise results. NATURE OF BUSINESS (provide a brief description)	ting and proposed intake and discharge structures, each of its hazardous waste here it injects fluids underground. Include all springs, rivers and other surface equirements.
ne outline of the facility, the location of each of its exist seatment, storage, or disposal facilities, and each well wheater bodies in the map area. See instructions for precise results. NATURE OF BUSINESS (provide a brief description)	ting and proposed intake and discharge structures, each of its hazardous waste here it injects fluids underground. Include all springs, rivers and other surface equirements. aircraft ejection seats and related components for
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20 May 1992 reply:ADEO.jfh92-28

Arizona Department of Environmental Quality Manager, Hazardous Waste Permits Unit Office of Waste Programs P.O.Box 600 Phoenix, AZ 85001-0600

Dear Sir:

Universal Propulsion Company, Inc., is currently operating a hazardous waste treatment unit (OBOD) under Interim status for the treatment of scrap solid propellants and oxidizers which exhibit the characteristics of D003 and D001, respectively. UPCO filed a RCRA Part B Application with your office on 8 Nov 1991.

During an inspection performed by the ADEQ Waste Inspection Unit on 8 Jan 1991 the operation of UPCO's burn pad per 40 CFR 265.382 was questioned. Specifically UPCO was asked to discuss alternative options which would bring the unit or method of disposal into compliance during Interim status.

After consultations with our ADEQ Compliance Officer, ADEQ Inspector, and ADEQ Office of Air Quality, an alternative was selected which we hope will handle most of our waste propellants and oxidizers. The device selected is a Thermal Treatment Unit (TTU) which we propose to operate under Subpart X, Miscellaneous Unit, rules the same as our current OBOD. We have submitted an application for an Installation Permit from ADEQ Office of Air Quality. The Draft Permit is in its final review phase and is expected to be issued by the first week of June 1992.

As part of the conditions of the Installation Permit UPCO will be required to perform extensive testing using actual hazardous waste propellants and oxidizers while determining stack emissions, feed rates, and other parameters required for future operations. UPCO is asking for a change to Interim status per 40 CRF 270.72 which would allow the treatment of hazardous wastes on-site in this Thermal Treatment Unit. For your reference, the conditions of the Installation Permit (Draft) are attached. The types of waste as well as amounts are specified for the testing phases.

We believe that $\operatorname{our}_{\mathfrak{I}} \mathfrak{I}^{\mathfrak{I}}$ request for change meets the requirements of 40 CFR 72 (a)(3)(ii), as this effort is to comply with Federal, State and Local requirements. It is our understanding that further approval from the Director (in



PAGE 2 ADEQ.jfh92-28

addition to that of the Installation Permit), is required prior to UPCO's treatment of hazardous waste in this unit even during the test phases. We are, therefore, asking for this specific approval in writing. We are also attaching a revised Part A Permit Application as required by rule and a copy of the design layout for the TTU.

We are anticipating that an amendment to our Part B Permit Application will be required once the test phase is completed and the necessary operating permit application is submitted. We would appreciate your concurrence or comments in this area.

Since we are eager to complete construction of our unit and enter the test phase, we hope necessary approval will soon be forthcoming. Questions may be directed to me or Mr. Steve Miller at 869-8067.

Sincerely,

UNIVERSAL PROPULSION COMPANY, INC.

John F. Huber

John John Johns

Vice President, Administration

3 Atchs: 1. Installation Permit No. 78004, Attachment B. (with drawn)

2. Part A Permit Application, revised.

3. Thermal Treatment Unit Layout (X-2011-054) ((to recomment)



23 Jul 1992

Arizona Department of Environmental Quality Office of Waste Programs Manager, Hazardous Waste Permits Unit P.O. Box 600 Phoenix, AZ 85001-0600

Reference: UPCO ltr 29 Jun 1992 from J. Huber to ADEQ Office of Waste Programs, Permit Unit

Dear Sir:

The reference letter was a request for Director approval for Universal Propulsion Company, Inc. to use scrap propellants and oxidizers generated at our facility in the test phases of our Thermal Treatment Unit. This material is a hazardous waste because of its reactivity.

Universal Propulsion Company, Inc. has now received its Installation Permit, No. 78004, from ADEQ Office of Air Quality. Based on this permit we have now commenced construction of the unit and anticipate the unit will be ready for initial testing by 14 September 1992. Initial testing will require the use of the hazardous waste outlined above. I have attached a copy of the permit and our construction notification letter.

It is our interpretation of the rules, specifically, 40 CFR 270.72, that Director approval must be specifically obtained before we can test our unit with the scrap material it is designed to treat. We believe that the approval of the Installation Permit may not meet the intent or letter of the law regarding treating this waste during testing while operating in interim status which is our current status. If your office does not have authority in this matter advise us as to the proper section/unit. Please provide us with a ruling on this matter or the Director approval we are seeking as soon as possible.

The amendment to our Part B RCRA Permit Application for a Subpart X, miscellaneous unit, is being drafted for submission. The revised Part A was submitted in the reference. We anticipate that the Part B amendment will be forwarded very soon. If you have any questions please me at 869-8067.

Sincerely,

Stephen J. Miller

Manager, Safety & Environmental

encls(2): 1. Installation Permit, 78004 (with drawn)

2. UPCO ltr 22 Jul 92, Notification of Construction





22 Jul 1992

Arizona Department of Environmental Quality Office of Air Quality 2005 North Central Avenue Phoenix, AZ 85004

Attention: Mr. John Burchard

Reference: Installation Permit No. 78004

Thermal Treatment System

Dear Mr. Burchard:

Pursuant to the referenced permit issued to Universal Propulsion Company we are making official notification to the Arizona Department of Environmental Quality, Office of Air Quality, that construction on the thermal treatment unit is commencing immediately. As required by para II of the Attachment A to the permit a notification in writing is required when construction is commenced. We had previously placed some of the equipment in its expected location while we awaited the final Installation Permit and now effective as of the date of this letter we will begin a final construction phase.

If all goes according to construction planning UPCO should be ready to begin the start-up of our Thermal Treatment Unit by 14 September 1992. This start-up will be for the purposes of testing only. A test plan will be developed as specified in the permit. We will be in touch with your department on this matter.

If you have any questions please contact Mr. Steve Miller at 869-8067.

Sincerely,

UNIVERSAL PROPULSION COMPANY, INC.

John F. Huber

V.P. Administration



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

FIFE SYMINGTON, GOVERNOR EDWARD Z. FOX, DIRECTOR

August 19, 1992 REF: HWP EX058

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Universal Propulsion Company, Inc. Stephen J. Miller Safety & Environmental Manager 25401 N. Central Ave. Phoenix, AZ 85027-9801

RE: Review of Universal Propulsion Company's Hazardous Waste Permit Application, Part A, EPA ID# AZD980814479

Dear Mr. Miller:

Universal Propulsion Company submitted a Hazardous Waste Permit Application, Part A & B, for the 25401 N. Central Avenue Facility on November 8, 1988. The facility has been operating in interim status since that date. An amended Part A application was submitted on May 21, 1992 to add a Thermal Treatment Unit (TTU) as a process in which waste propellants and oxidizers would be disposed. ADEQ has sent comments on the construction and operation of the TTU through the August 18, 1992 letter. When ADEQ receives adequate responses to the August 18, 1992 letter regarding the TTU, and a complete Part A application, ADEQ will complete our evaluation and make a final determination on approval of the TTU. As stated UPCo. would submit an amended Part B application within 180 days of the director's approval.

The Arizona Department of Environmental Quality (ADEQ) has reviewed the Part A permit application and has found it incomplete. Attached to this letter are ADEQ's comments which specify the application deficiencies.

Unless specified otherwise in the comment, your response to our comments must be in the form of a revised permit application, and the revised application must address each of the deficiencies noted. Two copies of the revise application should be submitted to the ADEQ Hazardous Waste Permits Unit at P.O. Box 600, Phoenix AZ 85001-0600, and one copy should be submitted to EPA Region 9, 1235 Mission St., San Francisco, CA 94103 ATTN: Paula Bisson (H-2-2).

The Department of Environmental Quality is An Equal Opportunity Affirmative Action Employer.

Post Office Box 600

Phoenix, Arizona 85001-0600

Please submit a response including a new Part A permit application. I am available to provide technical assistance and meet with your representatives at your request, in order to resolve issues and expedite the project. To arrange such a meeting, please contact me at (602) 207-4166.

Sincerely,
Taniel William

Daniel Williams

Hazardous Waste Permits Unit Office of Waste Programs

cc: Chris Heppe, EPA, Region 9

Holly Wheeler-Benson, ADEQ Haz. Waste Comp. Sec.

ADEQ DEFICIENCY COMMENTS ON THE UP CO. PART A PERMIT APPLICATION SUBMITTED MAY 21, 1992

GENERAL COMMENTS:

The response to the deficiency comments below must be in the form of a revised Part A permit application.

SPECIFIC COMMENTS:

As stated above, ADEQ has the Part A submitted on November 8, 1988 and the amended Part A submitted on May 21, 1992. Neither of the submittals are complete. ADEQ request the Part A be completed with the comments below and the enclosed EPA guidance document for Part A applications.

- 1. Include the latitude and longitude in Section III C.
- 2. Include the facility existence date in Section III D.
- 3. Include owner name, address, and phone number in Section VIII.
- 4. Include the operator type in Section VII B.
- 5. Include the owner type and any change of ownership information in Section VIII B & C.
- 6. Include SIC codes for Industrial classification on Section IX.
- 7. Include in the description of the Air Pollution Installation Permit for TTU and that it is an ADEQ permit in Section X C.
- 8. Describe briefly the Nature of Business in Section XI.
- 9. In Sections XIII & XIV of your May 21, 1992 Part A application indicates that scrap propellant is to be burned at the burn pad and TTU. ADEQ's understanding was that once the TTU was approved and tested that all scrap propellant was to be burned in the TTU. Only ignitable waste that contained lead was to be burned at the burn pad. Please clarify the description of Section XIII D.
- 10. Include a map which meets the requirements of Section XV.

- 11. Include facility drawings which meet the requirements of Section XVI.
- 12. Include photographs that meet the requirements of Section XVII.

10 September 1992

Arizona Department of Environmental Quality Hazardous Waste Permits Section P.O. Box 600 Phoenix, AZ 85001-0600

Ref: ADEQ ltr 19 Aug 92, HWP EX058, Deficiencies of UPCO Part A (Amended Submission to ADEQ 21 May 1992)

Dear Sir:

The attached Part A application contains the changes you requested in the ref. letter. This application is intended to cover the burning of hazardous waste (scrap solid propellant and oxidizer) in our Thermal Treatment Unit during interim status. This is a change in process in that, in addition to burning scrap propellant and oxidizer on the burn pad UPCO will also be burning some of the same material in the Thermal Treatment Unit during testing. We are seeking Director approval for a limited time to cover the period of our equipment and air emission (stack) testing phase under the ADEQ Air Installation Permit. We anticipate that Director approval for any operational phase including the period awaiting an Air Operating Permit after tests will need a separate request by us.

The quantity of scrap propellant and oxidizer treated during the test phase will not exceed that specified in the Air Installation Permit i.e., 540 lbs on any given test day. The equipment testing will verify the unit can safely burn the scrap up to the proposed maximum feed rate. Also several different combinations of scrap mixtures with oxidizer will have to be tested. We are hoping to have our testing phase completed during the period specified in our Air Installation Permit. We have contracted with a consultant to develop our Test Plan, gain approval from ADEQ Office of Air Quality for the plan, conduct actual stack sampling, and prepare the test results.

The areas of Sections XIII & XIV of the Part A Application were not changed from our 21 May 92 submission. Scrap propellant and oxidizer will be treated by burning at both the burn pad and in the Thermal Treatment Unit. The Thermal Treatment Unit, if it operates as we predict, will allow UPCO to significantly reduce the quantity of scrap required to be burned on the burn pad. We will still need to burn high density propellant and oxidizer and double base propellant (due to their lead content) on the burn pad. In addition, other



items such as cartriages, initiators, small explosive loaded metal devices, etc. and any small quantities of Class A explosives or explosive contaminated materials will be disposed of on the burn pad since they would be high particulate producers in the Thermal Treatment Unit.

To further clarify the information contained in Section XIV UPCO burns small explosive devices which may contain compounds of barium and chromium. Some metal containers are made with cadmium plating which may contaminate the ash residue on the pad. This is the reason for the additional waste numbers associated with the burn pad. Only propellants containing ammonium perchlorate and potassium perchlorate oxidizers as well as non-lead bearing double base propellants are anticipated to be burned in the Thermal Treatment Unit.

The estimated annual quantity of waste specified in Section XIV reflects the maximum for the burn pad currently allowed under our interim status which we will require for operation until such time the Thermal Treatment Unit is fully tested and operating permits are obtained. This allows us to continue normal operations while the Thermal Treatment Unit is not capable of burning propellants. Estimated quantity for the Thermal Treatment Unit is the maximum allowed under the Air Installation Permit.

A copy of the amended Part A will be sent to EPA Region 9 at the address you gave in the ref. I hope that the attached Part A will allow for timely Director approval for this efffort. Questions may be directed to me at 869-8067.

Sincerely,

Stephen J. Miller

Manager, Safety & Environmental

encl: UPCO RCRA Part A, amended 9 Sep 1992

cc: USEPA, Region IX, Ms. Bisson





10 September 1992

Ms. Paula Bisson (H-2-2)
U.S. Environmental Protection Agency
Region IX
1235 Mission Street 75 Handle ST.
San Francisco, CA 941075

Lun Alpha
Dear Ms. Bisson:

The following information and revised EPA Hazardous Waste Permit Application, Part A, are submitted by Universal Propulsion Company, Inc. (UPCO) for a change in process while in interim status per 40 CFR 270.72. In order to bring your files up to date I am enclosing correspondence between UPCO and the Arizona Department of Environmental Quality (ADEQ) concerning our efforts to permit and construct a Thermal Treatment Unit under Subpart X, Miscellaneous Units, rules for the purpose of disposing of scrap propellants and oxidizers generated by UPCO.

Attachment 1 is a copy of our Part A dated 13 Feb 1987 and submitted as Section A of UPCO's Part B Permit Application on 8 Nov 1988. We have been operating as a hazardous waste treatment facility in interim status for several years. As the result of several hazardous waste compliance inspections we have investigated alternatives to our open burning of scrap propellants and oxidizers. As a means of reducing quantities burned on the burn pad we are pursuing the treatment of some of this waste in a thermal treatment device. We pursued and obtained an Air Installation Permit from ADEQ Office of Air Quality. This is at attachment 2.

Based on our interpretation of the rules cited above we sought Director approval to actually burn scrap propellant and oxidizer in the Thermal Treatment Unit during the test phase allowed in the Installation Permit. This request is at attachments 3 & 4 which included a revised Part A (20 May 92) as required by rule. The revised Part A as well as the original were found to be deficient by ADEQ Hazardous Waste Permits Section (attachment 5). Therefore, we corrected the cited deficiencies and have resubmitted to ADEQ another Part A (dated 10 Sep 92). A copy is attached (attachment 6) for your files as requested by ADEQ.



The final attachment is a copy of the informational drawings of the Thermal Treatment Unit. Slight changes to these drawings are anticipated as we continue construction and testing. We will be modifying our Part B Permit Application as we seek operating permits for this additional process. Questions may be directed to me at (602) 869-8067.

Sincerely,

Stephen J. Miller

Manager, Safety & Environmental

Atchs: 1. UPCO Part A Permit Application, 13 Feb 87

2. ADEQ Air Installation Permit, 15 Jul 92 w/attchs

3. UPCO ltr to ADEQ, 20 May 92 4. UPCO ltr to ADEQ, 23 Jul 92

5. ADEQ ltr 19 Aug 92

6. UPCO Part A Application, 10 Sep 92 w/attchs 7. UPCO Drawing 2011.054, Thermal Treatment Unit



20 May 1992 reply:ADEQ.jfh92-28

Arizona Department of Environmental Quality Manager, Hazardous Waste Permits Unit Office of Waste Programs P.O.Box 600 Phoenix, AZ 85001-0600

Dear Sir:

Universal Propulsion Company, Inc., is currently operating a hazardous waste treatment unit (OBOD) under Interim status for the treatment of scrap solid propellants and oxidizers which exhibit the characteristics of D003 and D001, respectively. UPCO filed a RCRA Part B Application with your office on 8 Nov 1991.

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After consultations with our ADEQ Compliance Officer, ADEQ Inspector, and ADEQ Office of Air Quality, an alternative was selected which we hope will handle most of our waste propellants and oxidizers. The device selected is a Thermal Treatment Unit (TTU) which we propose to operate under Subpart X, Miscellaneous Unit, rules the same as our current OBOD. We have submitted an application for an Installation Permit from ADEQ Office of Air Quality. The Draft Permit is in its final review phase and is expected to be issued by the first week of June 1992.

As part of the conditions of the Installation Permit UPCO will be required to perform extensive testing using actual hazardous waste propellants and oxidizers while determining stack emissions, feed rates, and other parameters required UPCO is asking for a change to future operations. Interim status per 40 CRF 270.72 which would allow treatment of hazardous wastes on-site in this Thermal Unit. For your reference, the conditions of (Draft) are attached. The types of Installation Permit waste as well as amounts are specified for the testing phases.

We believe that our request for change meets the requirements of 40 CFR 72 (a)(3)(ii), as this effort is to comply with Federal, State and Local requirements. It is our understanding that further approval from the Director (in



PAGE 2 ADEQ.jfh92-28

addition to that of the Installation Permit), is required prior to UPCO's treatment of hazardous waste in this unit even during the test phases. We are, therefore, asking for this specific approval in writing. We are also attaching a revised Part A Permit Application as required by rule and a copy of the design layout for the TTU.

We are anticipating that an amendment to our Part B Permit Application will be required once the test phase is completed and the necessary operating permit application is submitted. We would appreciate your concurrence or comments in this area.

Since we are eager to complete construction of our unit and enter the test phase, we hope necessary approval will soon be forthcoming. Questions may be directed to me or Mr. Steve Miller at 869-8067.

Sincerely,

UNIVERSAL PROPULSION COMPANY, INC.

John F. Huber

Vice President, Administration

3 Atchs: 1. Installation Permit No. 78004, Attachment B.

2. Part A Permit Application, revised.

3. Thermal Treatment Unit Layout (X-2011-054)

404 4/3/5/

UNIVERSAL PROPULSION COMPANY, INC.

19 February 1991

Mr. Richard Vaille, P.E./Program Manager Office of Waste Programs U.S. Environmental Protection Agency, Region IX Toxic & Waste Management Div. T-2-5 215 Fremont Street San Francisco, California 94105

Dear Mr. Vaille:

Enclosed is a copy of a Certificate of Liability Insurance which demonstrates that Universal Propulsion Company, Inc. (EPA I.D. No. AZD980814479) has continuing insurance coverage as a hazardous waste facility. The original certificate was submitted to your office on 5 January 1989. The coverage meets the requirements of 40 C.F.R.265.147(a) and (b) for sudden and non-sudden accidental occurrences.

Universal Propulsion Company, Inc. is currently operating in interim status and submitted an RCRA Part B Permit Application on 7 November 1988. The enclosed certificate of liability insurance demonstrates a continued compliance with 40 C.F.R.264.147(j) and the Part B Permit Application requirements of 40 C.F.R. 270.14(b)(17). While Universal Propulsion Company, Inc.'s liability insurance covers both sudden and non-sudden accidental occurrences, Universal Propulsion Company, Inc. continues to maintain that it is not required to demonstrate financial responsibility for non-sudden occurrences under 40 C.F.R.264.147(b) because it does not manage hazardous wastes in a landfill, surface impoundment or land treatment facility.

Sincerely,

UNIVERSAL PROPULSION COMPANY, INC.

John Huber

John John de

Vice President Administration

JH/n

enclosure (1)



HAZARDOUS WASTE FACTLITY CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer: National Union Fire Insurance Company of

Pittsburgh, PA.

Address of Insurer: 70 Pine Street, New York, NY 10270

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: <u>Universal Propulsion Co., a subsidiary of</u>

Talley Industries, Inc.

Address of Insured: P.O. Box 1140

Black Canyon Stage #1 Phoenix, AZ 85029

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (See Below) for <u>Sudden and Non-sudden Accidental Occurrences</u>. The limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number <u>PII-5290164</u> issued on <u>December 6, 1990</u>. The effective date of said policy is <u>December 6, 1990</u>.

- 2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) or the EPA Region(s) in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

SCHEDULE

Name of Facility

Address or Location

Number

Universal Propulsion 2401 N. Central Ave Phoenix, AZ

EPA Identification Number

AZD980814479

I hereby certify that the wording of this instrument is identical to the wording specified in 40 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Authorized Representative & Title

Nola M. Cameron

Manager - Pollution Legal Liability

Name of Insurer: National Union Fire Insurance Company of

Pittsburgh, PA.

Address of Insurer: 70 Pine Street, New York, NY 10270

meron



1 February 1990

Mr. Richard Vaille, P.E. /Prog.Mgr. Office of Waste Programs
U.S. Environmental Protection Agency, Region IX
Toxic & Waste Management Div. T-2-5
215 Fremont Street
San Francisco, California 94105

Dear Mr. Vaille:

Enclosed is a copy of a Cerificate of Liability Insurance which demonstrates that Universal Propulsion Company, Inc. (EPA I.D. No. AZD980814479) has continuing insurance coverage as a hazardous waste facility. The original certificate was submitted to your office on 5 January 1989. The coverage meets the requirements of 40 C.F.R.265.147(a) and (b) for sudden and non-sudden accidental occurrences.

Universal Propulsion Company, Inc. is currently operating in interim status and submitted a RCRA Part B Permit Application on 7 November 1988. The enclosed certificate of liability insurance demonstrates a continued compliance with 40 C.F.R.264.147(j) and the Part B Permit Application requirements of 40 C.F.R. 270.14(b)(17). While Universal Propulsion Company, Inc.'s liability insurance covers both sudden and non-sudden accidental occurrences, Universal Propulsion Company, Inc. continues to maintain that it is not required to demonstrate financial responsibility for non-sudden occurrences under 40 C.F.R.264.147(b) because it does not manage hazardous wastes in a landfill, surface impoundment or land treatment facility.

Sincerely,

UNIVERSAL PROPULSION COMPANY, INC.

W. E. Hallas

Director, Facilities & Safety

WEH:bb Encl. (1)



HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer: National Union Fire Insurance Company of Pittsburgh, PA.
Address of Insurer: 70 Pine Street, New York, NY 10270

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: <u>Universal Propulsion Co., a subsidiary of Talley Industries, Inc.</u>

Address of Insured: P.O. Box 1140

Black Canyon Stage #1 Phoenix, AZ 85029

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (See Below) for <u>Sudden and Nonsudden Accidental Occurrences</u>. The limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number <u>PLL-7166268</u> issued on <u>December 6, 1989</u>. The effective date of said policy is <u>December 6, 1989</u>.

- 2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) or the EPA Region(s) in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

SCHEDULE

Name of Facility

Address or Location

Universal Propulsion 2401 N. Central Ave Phoenix, AZ

EPA
Identification
Number

AZD980814479

I hereby certify that the wording of this instrument is identical to the wording specified in 40 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Jaul Kinni
Authorized Representative & Title

Paul J. Kinni Manager - Pollution Legal Liability

Name of Insurer: National Union Fire Insurance Company of

Pittsburgh, PA.

Address of Insurer: 70 Pine Street, New York, NY 10270

ATTACKMENT NO. 1



1 February 1984

U.S. Environmental Protection Agency 215 Fremont Street San Francisco, CA 94105

Attention: Jane Diamond

Reference: 1) T-2-1 AZD980814479 Ltr dated 1/20/84

2) Telecons on 1/30/84 & 2/1/84 with Lucy Mlenar

Dear Ms. Diamond:

The reference 1) letter indicates that Universal Propulsion Company's Part A of the application for an EPA hazardous waste permit is not on file at your office. Our Part A application was prepared and signed on 6 January 1983. Donovan Jones of Talley Industries, Inc., submitted this to your agency by letter of 15 March 1983. Copies of these documents are enclosed herewith.

This response to your request is the result of the reference 2) conversations with your Lucy Mlenar.

Sincerely,

UNIVERSAL PROPULSION COMPANY, INC.

W. E. Hallas

Facilities & Safety Director

WEH:mac

cc. B. Williams, Az Dept. of Health Services
 (w/o attachements)





REF: DJJ-2648

March 15, 1983

Mr. William D. Wilson Region IX, Environmental Protection Agency Section Chief T-2-2 Toxics and Waste Programs Branch 215 Freemont Street San Francisco, California 94105

Dear Mr. Wilson:

Enclosed is a Part A Permit Application for Universal Propulsion Company which was recently filed with the Arizona Department of Health Services.

Universal Propulsion Company does not have an EPA I.D. Number. It will be appreciated if same can be furnished as soon as possible.

Cordially,

Donovan J. Jones

DJJ:jt

Enclosure

cc: M. Betka

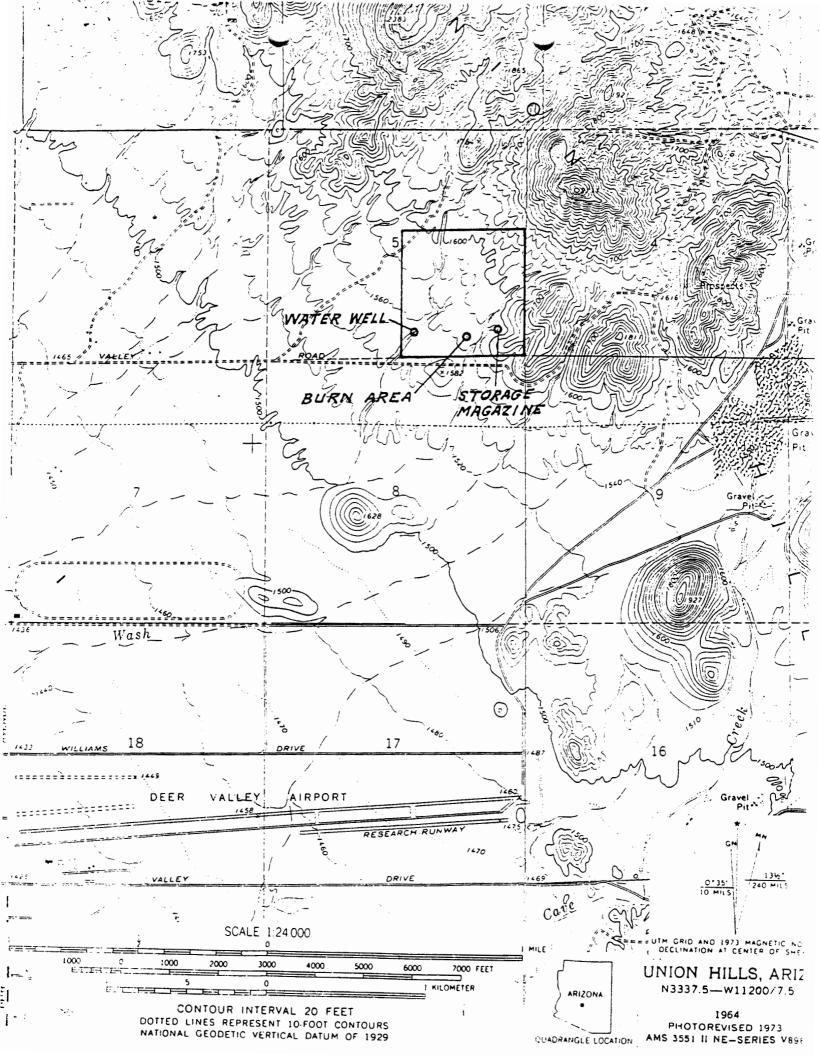
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II. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OF DESCRIBING OTHER PROCESSES (code "TO" FOR EACH PROCESS ENTERED HE!

Open burning of waste explosives per 40 CFR 265.382.

2,000 pounds (approx. 140 gallons) per month, estimated maximum, of waste composite solid propellant.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
POUNDSP	KILOGRAMS,	K
TONS	 METRIC TONS	М

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

- 1. PROCESS CODES:
 - For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
- quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste."

EXAMPLE FOR COMPLETING ITEM IV (shown In line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 200 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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X-4	D	0	0	2					-					included with above

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PAGE 4 OF 5

2617.60 FEET PROPERTY BOUNDARY AREA MFG AREA OSTORAGE SITE (MAGAZINE) DISPOSAL SITE (BURN AREA) ADMIN. BLDG 2565.09 FEET PRIPERTY BOUNDARY SCALE: I INCH = 400 FEET

EACILITY DRAWING (see page 4)